

Hearing Date: May 31, 2007

Hearing Time: 10:00 a.m. (Prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**DEBTORS' OMNIBUS REPLY IN SUPPORT OF DEBTORS'
TWELFTH OMNIBUS OBJECTION (PROCEDURAL) PURSUANT
TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A)
DUPLICATE AND AMENDED CLAIMS AND (B) EQUITY CLAIMS**

Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"),¹ hereby submit this omnibus reply in support of the Debtors' Twelfth Omnibus Objection (Procedural) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims And (B) Equity Claims (Docket No. 7824) (the "Twelfth Omnibus Claims Objection"), and respectfully represent as follows:

1. The Debtors filed the Twelfth Omnibus Claims Objection on April 27, 2007, seeking to disallow and expunge certain "Claims," as that term is defined in 11 U.S.C. § 101(5), because such Claims (a) are duplicative of other Claims or have been amended or superseded by later-filed Claims and each such expunged Claim is survived by one Claim, (b) were filed by holders of Delphi common stock solely on account of their stock holdings and were untimely pursuant to the Bar Date Order, or (c) were filed by holders of Delphi common stock solely on account of their stock holdings and contain insufficient documentation in support of the unpaid dividend portions of the Claims asserted. The Debtors sent to each claimant whose proof of claim is subject to an objection pursuant to the Twelfth Omnibus Claims Objection a personalized Notice Of Objection To Claim, which specifically identified such claimant's proof of claim that is subject to an objection and the basis for such objection. Responses to the Twelfth Omnibus Claims Objection were due by 4:00 p.m. (prevailing Eastern time) on May 24, 2007.

¹ Capitalized terms used and not otherwise defined herein have the meanings ascribed to them in the Twelfth Omnibus Claims Objection.

2. As of May 29, 2007 at 12:00 p.m. (prevailing Eastern time), the Debtors had received four timely-filed formal responses to the Twelfth Omnibus Claims Objection (collectively, the "Responses"). A chart summarizing each of the Responses by respondent is attached hereto as Exhibit A. The four Responses were filed by holders of five Claims.

3. As set forth on Exhibit A hereto, the Debtors have agreed to adjourn to a future date the claims hearing with respect to the five Claims for which Responses were filed. The revised proposed order, a copy of which is attached hereto as Exhibit B (the "Revised Order"),² reflects the adjournment of the hearings with respect to the Claims for which Responses were filed.

4. Pursuant to the Order Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026, 9006, 9007, And 9014 Establishing (i) Dates For Hearings Regarding Objections To Claims And (ii) Certain Notices And Procedures Governing Objections to Claims (Docket No. 6089) (the "Claims Objection Procedures Order"), the hearing with respect to each of the Claims for which a Response was filed will be adjourned to a sufficiency hearing or claims objection hearing, as appropriate, to determine the disposition of each such Claim.

5. Except for those Claims for which a hearing has been adjourned to a future hearing date, the Debtors believe that the Revised Order adequately addresses the concerns of the respondents. Thus, the Debtors request that the Court grant the relief requested by the Debtors and enter the Revised Order.

² Attached hereto as Exhibit C is a copy of the Revised Order marked to show revisions to the form of proposed order that was submitted with the Twelfth Omnibus Claims Objection.

WHEREFORE the Debtors respectfully request that this Court enter an order (a) sustaining the Twelfth Omnibus Claims Objection, subject to the modifications reflected in the Revised Order, (b) adjourning the hearing with respect to all Claims for which a Response was filed pursuant to the Claims Objection Procedures Order, and (c) granting the Debtors such other and further relief as is just.

Dated: New York, New York
May 30, 2007

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